



CITI0140

PATENT

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of

**John ARCHER, et al.**

Art Unit: **3624**

Serial No.: **09/734,693**

Examiner: **COLBERT, Ella**

Filed: **December 13, 2000**

For: **METHOD AND SYSTEM FOR DATABASE QUERY**

**APPEAL BRIEF**

Commissioner for Patents  
U.S. Patent and Trademark Office  
Customer Service Window, Mail Stop **Appeal Brief - Patents**  
Randolph Building  
401 Dulany Street  
Alexandria, VA 22314

Sir:

This is an Appeal Brief under 37 C.F.R. § 41.37 in connection with the Final Office Action mailed on April 6, 2006. It is respectfully submitted that the topics required by Rule 41.37 are presented herewith and labeled appropriately.

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(1) **REAL PARTY IN INTEREST**

The real party in interest in this appeal is Citibank, N.A.

(2) **RELATED APPEALS AND INTERFERENCES**

There are no other appeals or interferences known to be related to this case.

(3) **STATUS OF CLAIMS**

Claims 1-30 are pending. Claims 1-30 are rejected and appealed.

(4) **STATUS OF AMENDMENTS**

No amendments to the claims, specification or drawings were filed subsequent to the final rejection.

(5) **SUMMARY OF CLAIMED SUBJECT MATTER**

An embodiment of the invention is a method of searching financial transactions against a server-resident matchable text pattern file of sanctioned entities using a network, the network including a plurality of servers accessible by a plurality of user terminals (*See, e.g.* p. 8, ll. 2-13; Fig. 1, items 1-6; p. 1, ll. 16-20), comprising: inputting at one of the plurality of user terminals a search request text pattern for searching the server-resident matchable text pattern file of sanctioned entities, the search request text pattern including a text string, the text string further including one or more regular expression operators, including letters, digits or punctuation marks

to further define the search request text pattern and to further identify a server being invoked among the plurality of servers (*See, e.g.* p. 8, ll.13-23; Fig. 1, items 1-5C); storing the search request text pattern as an entry in a search request instruction file, the search request instruction file being accessible by a server processor (*See, e.g.* p. 9, ll.10-18; Fig. 1, items 1-6A); transmitting the search request instruction file to the server processor invoked via the network (*See, e.g.* p. 8, ll. 2-8; Fig. 1, items 1-6); the server processor checking the search request text pattern, the checking including determining a match of the search request text pattern against the matchable text pattern file of sanctioned entities in the server (*See, e.g.* p. 9, l. 19 - p. 10. l. 7; Fig. 3); and upon execution of the search, transmitting search results to the one of the plurality of user terminals via the network (*See, e.g.* p. 10. ll.7-20; Fig. 1).

A further embodiment of the invention is a transaction screening system including a network, the network including a plurality of servers and a plurality of user terminals (*See, e.g.* p. 8, ll. 2-13; Fig. 1, items 1-6), comprising: means for inputting at one of the plurality of user terminals a text pattern selection for searching a server-resident matchable text pattern file of sanctioned entities, wherein the text pattern selection includes a text string including one or more regular expression operators, including letters, digits or punctuation marks to further define the text pattern selection and identify a server being invoked among the plurality of servers (*See, e.g.* p. 8, ll.13-23; Fig. 1, items 1-5C); means for storing the text pattern selection as an entry in a search request instruction file, the search request instruction file being accessible by a server processor of the server being invoked (*See, e.g.* p. 9, ll.10-18; Fig. 1, items 1-6A); means for transmitting the search request instruction file to the server processor of the server being invoked (*See, e.g.* p. 8, ll. 2-8; Fig. 1, items 1-6); means for the server processor to determine a match of

the text pattern selection against the server-resident matchable text pattern file of sanctioned entities (*See, e.g.* p. 9, l. 19 - p. 10, l. 7; Fig. 3); and means for transmitting search results to the one of the plurality of user terminals via the network (*See, e.g.* p. 10, ll.7-20; Fig. 1).

**(6) GROUND OF REJECTION PRESENTED FOR REVIEW**

Claims 1, 10-16, and 25-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran (U.S. Patent No. 5,995,979) (“Cochran”).

Claims 2-5 and 17-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran in view of “Compliance Solutions.”

Claims 6-9 and 21-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran and “Compliance Solutions” in view of High, Jr. et al. (U.S. Patent No. 5,842,219) (“High”).

**(7) ARGUMENT**

**Rejection of Claims 1, 10-16, and 25-30 Under 35 U.S.C. § 103(a)**

Claims 1, 10-16, and 25-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran (U.S. Patent No. 5,995,979) (“Cochran”). This rejection is respectfully traversed.

Cochran does not disclose, as recited in claim 1, “inputting at one of the plurality of user terminals a search request text pattern ... including a text string ... to further define the search request text pattern and to further identify the server being invoked among the plurality of servers,” (emphasis added) (Claim 16 has a similar limitation).

Cochran discloses that the user selects from list identifiers, which are “terms or phrases identifying various categories of information that the user may select when formulating a search strategy.” Col. 7, lines 19-21. The user in Cochran is choosing a search from a list of various categories. In the present application, the user “inputs” a search request text pattern including a text string to further define the search request text pattern and to further identify the server being invoked. Cochran transmits the list identifiers from the server to the user. Col. 7, lines 9-18. As a result, the user only searches the server that transmitted the list identifiers. The user in Cochran is unable to “identify the server” because only one server is being searched. Thus, Cochran has no need to identify the server.

Additionally, claim 1 recites, “determining a match of the search request text pattern against the matchable text pattern file of sanctioned entities in the server.” (emphasis added) (Claim 16 has a similar limitation). Cochran, however, teaches away from determining a match by presenting to the user only search terms that will return a hit:

Only choices or search terms that are actually available are presented to the user. Hence, users are never put in the position of failing to find information that meet the criteria they have chosen. Only search terms that will return a "hit" are presented on the display device. Likewise, the user will be informed even of words that are misspelled on the database. (Cochran; Col. 4, lines 29-35).

For at least the reasons stated above, Cochran does not teach or suggest, or make obvious, independent claims 1 or 16 of the present application. Therefore, the undersigned respectfully submits that independent claims 1 and 16 are allowable over the cited art. Further, dependent claims 10-15 and 25-30 are also allowable as they contain the limitations of the claims on which they depend.

**Rejection of Claims 2-5 and 17-20 Under 35 U.S.C. § 103(a)**

Claims 2-5 and 17-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran in view of “Compliance Solutions.” This rejection is respectfully traversed.

Claims 2-5 and 17-20 are dependent upon claims 1 and 16 which are allowable in view of Cochran for the reasons set forth above. Because “Compliance Solutions” does not teach or suggest the deficiencies of Cochran, claims 2-5 and 17-20 are not obvious in view of the cited references and should therefore be allowed.

**Rejection of Claims 6-9 and 21-24 Under 35 U.S.C. § 103(a)**

Claims 6-9 and 21-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cochran and “Compliance Solutions” in view of High, Jr. et al. (U.S. Patent No. 5,842,219) (“High”). This rejection is respectfully traversed.

Claims 6-9 and 21-24 are dependent upon claims 1 and 16 which are allowable in view of Cochran for the reasons set forth above. Because “Compliance Solutions” and High do not teach or suggest the deficiencies of Cochran, claims 6-9 and 21-24 are not obvious in view of the cited references and should therefore be allowed.

**(8) Claims Appendix**

See attached Claims Appendix

**(9) Evidence Appendix**

None

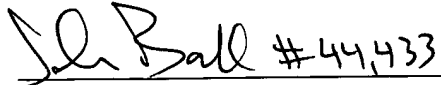

**(10) Related Proceedings Appendix**

None

**Conclusion**

For at least these reasons, claims 1-30 are patentable over the cited art. It is respectfully requested that the rejections by the Examiner be reversed and these claims be allowed. Please charge any fees due to Deposit Account No. 50-1458.

Respectfully submitted,

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**(8) CLAIMS APPENDIX**

1. A method of searching financial transactions against a server-resident matchable text pattern file of sanctioned entities using a network, the network including a plurality of servers accessible by a plurality of user terminals, comprising:

inputting at one of the plurality of user terminals a search request text pattern for searching the server-resident matchable text pattern file of sanctioned entities, the search request text pattern including a text string, the text string further including one or more regular expression operators, including letters, digits or punctuation marks to further define the search request text pattern and to further identify a server being invoked among the plurality of servers;

storing the search request text pattern as an entry in a search request instruction file, the search request instruction file being accessible by a server processor;

transmitting the search request instruction file to the server processor invoked via the network;

the server processor checking the search request text pattern, the checking including determining a match of the search request text pattern against the matchable text pattern file of sanctioned entities in the server; and

upon execution of the search, transmitting search results to the one of the plurality of user terminals via the network.

2. The method according to claim 1, wherein the server-resident matchable text pattern file includes the OFAC sanction list.

3. The method according to claim 2, wherein servers are located in different countries.



4. The method according to claim 3, wherein the server includes a plurality of matchable text pattern files including user defined sanction lists.

5. The method according to claim 4, wherein the search request instruction file further defines the matchable text pattern files to be searched.

6. The method according to claim 1, further comprising:  
defining sanctioned entities as matchable text patterns;  
storing matchable text patterns as individual phrases;  
arranging individual phrases as a letter tree array;  
generating a search node for each character in the search request text pattern to be checked against matchable text patterns;  
comparing search nodes against characters and positions in the letter tree array; and  
determining whether a match occurs.

7. The method according to claim 6, wherein the search request instruction file includes a spell correct flag to include spelling variations of the search request text pattern to be checked against the matchable text pattern file.

8. The method according to claim 6, wherein the search request instruction file includes a missing letters flag to include missing letters in the text pattern to be checked against the matchable text pattern file.

9. The method according to claim 6, wherein the search request instruction file includes a transposed letters flag to include transposed letters in the text pattern to be checked against the matchable text pattern file.

10. The method according to claim 1, further comprising:

generating a user authorization code at the time the terminal user inputs a text pattern selection for checking against a sanctioned entity database;

storing the authorization code with the text pattern selection in the search request instruction file, wherein the authorization code must be received in order to access the server.

11. The method according to claim 1, further comprising:  
generating a privileged user authorization code, wherein the privileged user authorization code must be received in order to create or modify a matchable text pattern file.

12. The method according to claim 1, wherein matchable text pattern files are replicated between each server via the network.

13. The method according to claim 12, wherein matchable text pattern files are mutually updating via the network.

14. The method according to claim 13, wherein server failure automatically routes search request instruction files to an alternate server.

15. The method according to claim 1, wherein the search request instruction file is generated by a computer program.

16. A transaction screening system including a network, the network including a plurality of servers and a plurality of user terminals, comprising:

means for inputting at one of the plurality of user terminals a text pattern selection for searching a server-resident matchable text pattern file of sanctioned entities, wherein the text pattern selection includes a text string including one or more regular expression operators, including letters, digits or punctuation marks to further define the text pattern selection and identify a server being invoked among the plurality of servers;

means for storing the text pattern selection as an entry in a search request instruction file, the search request instruction file being accessible by a server processor of the server being invoked;

means for transmitting the search request instruction file to the server processor of the server being invoked;

means for the server processor to determine a match of the text pattern selection against the server-resident matchable text pattern file of sanctioned entities; and

means for transmitting search results to the one of the plurality of user terminals via the network.

17. The system according to claim 16, wherein the server resident matchable text pattern file includes the OFAC sanction list.

18. The system according to claim 17, wherein servers are located in different countries.

19. The system according to claim 18, wherein the server includes a plurality of matchable text pattern files including user defined sanction lists.

20. The system according to claim 19, wherein the search request instruction file further defines the matchable text pattern files to be searched.

21. The system according to claim 16, further including:

means for defining sanctioned entities as matchable text patterns;

means for storing matchable text patterns as individual phrases;

means for arranging individual phrases as a letter tree array;

means for generating a search node for each character in the search request text pattern to be checked against matchable text patterns;

means for comparing search nodes against characters and positions in the letter tree array;  
and

means for determining whether a match occurs.

22. The system according to claim 21, wherein the search request instruction file includes a means for including spelling variations of search request text patterns to be checked against the matchable text pattern file.

23. The system according to claim 21, wherein the search request instruction file includes a means for including missing letters in the search request text pattern to be checked against the matchable text pattern file.

24. The system according to claim 21, wherein the search request instruction file includes a means for including transposed letters in the search request text pattern to be checked against the matchable text pattern file.

25. The system according to claim 16, further comprising:

means for generating a user authorization code at the time the terminal user inputs a text pattern selection for checking against a sanctioned entity database; and

means for storing the authorization code with the text pattern selection in the search request instruction file, wherein the authorization code must be received in order to access the server.

26. The system according to claim 16, further comprising:

means for generating a privileged user authorization code, wherein the privileged user authorization code must be received in order to create or modify a matchable text pattern file.

27. The system according to claim 16, including means for replicating matching text pattern files between each server via the network.

28. The system according to claim 27, including means for mutually updating matchable text pattern files via the network.

29. The system according to claim 28, including means for automatically routing search request instruction files to an alternate server upon server failure.

30. The system according to claim 16, including means for generating search request instruction file by a computer program.